

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

NATHAN LING,)
Plaintiff,)
vs.) Case No.: 3:20-cv-00233
CAMPBELL COUNTY, TENNESSEE,) Judge Atchley
et al.,) Magistrate Judge McCook
Defendants.)

**PLAINTIFF'S RESPONSE TO DEFENDANTS' CAMPBELL COUNTY, TENNESSEE
AND DAKOTA WILLIAMS' MOTION FOR SUMMARY JUDGMENT**

Comes now the Plaintiff, by and through counsel, and hereby responds in opposition to Defendants Campbell County, Tennessee and Dakota Williams' Motion for Summary Judgment.

This is a case wherein Campbell County's failure to provide any training on the proper use of force and intervention to protect detainees/inmates resulted in a culture of violence within the Campbell County Jail. This culture of violence directly led to the brutal beating of Nathan Ling, a pre-trial detainee, and the denial of medical care for several hours. The record reflects that genuine issues of material fact exist, which preclude judgment as a matter of law. The record further reflects admissions from the sheriff and officers that a culture of violence and intimidation existed among the jail staff, and that officers received no training on the proper use of force, intervening to protect detainees, and providing medical care to injured detainees. The defendants' motion should also be denied because Dakota Williams is not entitled to qualified immunity.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order denying Defendants Campbell County, Tennessee and Dakota Williams' Motion for Summary Judgment.

Respectfully submitted,

/s/ Tony Seaton
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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of November, 2023, a copy of the foregoing was filed electronically using the Court's ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. Mail. Parties may access this filing through the Court's electronic filing system.

/s/ Tony Seaton
Counsel for Plaintiff